

*Cities and ASUST 12.1.1*

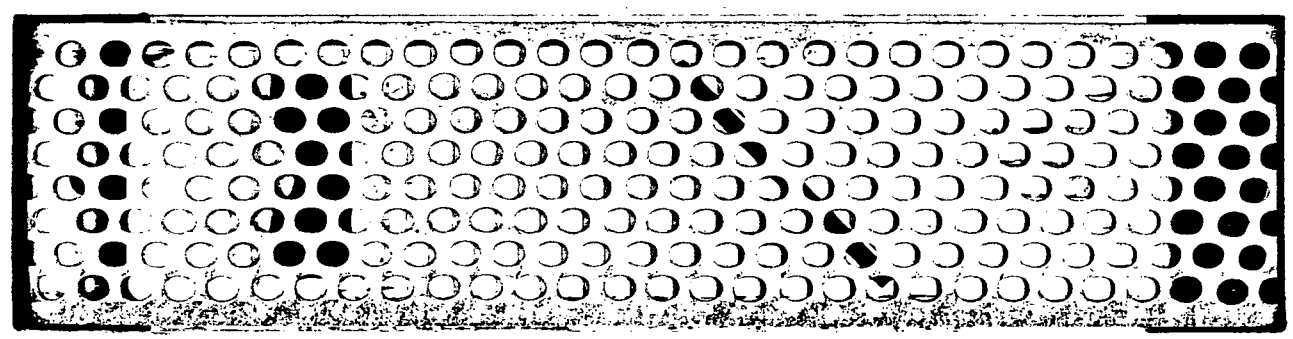
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FROM • Susan L. Macrae Sierra Club			CONTROL NO. AWMD-84-01	
SUBJECT AND DATE  RE: ASARCO			DATE REC'D Oct. 13, 1983	
			DUE DATE Oct. 27, 1983	
REFERRED (1) GAULDING	(2) <i>/Johnston/Davoli</i>	(3) <i>Hooper - Mark - What do you know about the economic stuff?</i>	(4)	
DATE 10/19/83 REPLY SENT TO			DATE RELEASED <i>J</i>	
REMARKS  Prepare for <u>Alex's</u> signature.			ACKNOWLEDGED - DATE <input checked="" type="checkbox"/> 11/2/83 <i>M.S.</i>	
			NO ANSWER NEEDED  <input type="checkbox"/> (Explain in remarks)	

EPA Form 5180-1 (6-72)  
REPLACES FWPCA FORM 72 AND  
EW-73 WHICH MAY NOT BE USED.

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M/S 532

NOV 02 1983

Susan L. Macrae  
Northwest Office  
Sierra Club  
1516 Melrose Avenue  
Seattle, Washington 98122

Dear Ms. Macrae:

Your letters to Ernesta Barnes and Alexandra Smith, received September 15, 1983 and October 13, 1983, respectively, asking if EPA has used Section 321 of the Federal Clean Air Act (Act) against ASARCO to gain a more accurate economic analysis concerning EPA standards, has been referred to me for reply.

This agency complies with Section 321(a) by publishing an annual report of current or anticipated plant closures attributable to EPA in carrying out its responsibilities under the Act and other Federal statutes. Section 321(b) has not been invoked for purposes of acquiring more accurate economic information concerning ASARCO because the Administrator has received no petition to date from any employee or representative of ASARCO to conduct such an investigation. It should be noted that EPA does develop a detailed economic analysis for each regulatory action undertaken under Section 112 of the Act (Nationally Emission Standards for Hazardous Air Pollutants).

As a matter of information, EPA does have in its possession financial information on ASARCO-Tacoma which was obtained from available sources such as Securities and Exchange Commission reports and under Section 114 of the Act. EPA plans to use Section 114 in the event additional financial data are needed.

If you have any further questions regarding the ongoing regulatory activity concerning the ASARCO-Tacoma smelter, please feel free to contact me at (206) 442-1949.

Sincerely,

/s/ Hooper

Mark H. Hooper  
Chemical Engineer

cc: H. Droege, WDOE  
A. Dammkoehler, PSAPCA  
M. Johnston, EPA

Hooper:kf:10/27/83; jm:11/01/83



# SIERRA CLUB

Northwest Office

1516 Melrose Avenue, Seattle, Washington 98122 (206) 621-1696

Alexandra Smith  
U.S. Environmental Protection Agency  
Region X (M/S 605)  
1200 Sixth Avenue  
Seattle, WA 98101

Dear Ms. Smith,

I am writing at this time in reference to a letter I wrote to Ms. Barnes a few weeks ago. Because I have not received a response from her I thought that perhaps you could answer my question. I was wondering if the EPA has used Section 321 against ASARCO to gain a more accurate economic analysis concerning EPA standards. I hope to hear from you soon.

Sincerely,

Susan L. Macrae

RECEIVED  
JUL 13 1983

A. E. CECILIOUS MATERIALS DIV.

Susan L. Macrae  
Sierra Club  
1516 Melrose Ave.  
Seattle, WA 98122

Ernesta Barnes  
EPA's Northwest Regional Administrator  
1200 Sixth Avenue  
Seattle, WA 98101

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SEP 15 1983

OFFICE OF  
REGIONAL ADMINISTRATOR

Dear Ms. Barnes,

I am writing at this time with regard to the Clean Air Act and Employment Effects. I would like to know if the EPA has used Section 321 against ASARCO and their copper smelter in Ruston. I hope to hear from you soon concerning this question.

Sincerely,

*Susan L. Macrae*

Susan L. Macrae

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SEP 20 1983

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